

EXHIBIT A

COVINGTON

BEIJING BRUSSELS DUBAI FRANKFURT JOHANNESBURG
LONDON LOS ANGELES NEW YORK PALO ALTO
SAN FRANCISCO SEOUL SHANGHAI WASHINGTON

Emily Johnson Henn

Covington & Burling LLP
3000 El Camino Real
5 Palo Alto Square
Palo Alto, CA 94306-2112
T +1 650 632 4715
ehenn@cov.com

By Electronic Mail (*lweaver@bfalaw.com*;
mmelamed@bfalaw.com; *jsamra@bfalaw.com*)

August 28, 2023

Lesley E. Weaver, Esq.
Matthew Melamed, Esq.
Joshua D. Samra, Esq.
Bleichmar Fonti & Auld LLP

Re: *White, et al. v. Samsung Electronics America, Inc.*, Civil Action No. 17-1775 (D.N.J.)

Dear Counsel:

I write to follow up on our meet and confer on August 21, 2023 and in response to your August 23, 2023 letter.

I. Discovery from Plaintiffs

It can be no coincidence that the more Plaintiffs learn about the lack of factual and legal merit to their Federal wiretapping claim, the more Plaintiffs double down on their unreasonable discovery demands and efforts to take discovery about discovery. This tactic is transparent and counterproductive and we urge you to stop.

As an initial matter, Samsung Electronics America (“SEA”) notes that Plaintiffs make much ado about SEA’s purported discovery delays while failing to comply with their own discovery obligations. Despite receiving SEA’s initial requests for production and interrogatories over three months ago, Plaintiffs have yet to fully respond to SEA’s discovery requests. *See generally* SEA’s First Set of Requests for Production Served May 22, 2023; SEA’s First Set of Interrogatories to Plaintiff White Served May 22, 2023; SEA’s First Set of Interrogatories to Plaintiff Cauley Served May 22, 2023. Though Plaintiffs are quick to point out that the original complaint was filed in 2017, Plaintiffs have not produced all documents or data concerning the Smart TVs which are the subject matter of this lawsuit. In fact, Plaintiffs have failed to produce virtually any documents other than promotional materials and have yet to produce even purchase receipts for the five other Samsung Smart TVs that Plaintiffs only recently indicated they had purchased. SEA’s Aug. 24, 2023 Letter, at 5. To be clear, Plaintiffs threaten court intervention to order Samsung to produce data associated with millions of Smart TVs when Plaintiffs have not produced accessible data from their own Smart TVs.

Further, Plaintiffs recently disclosed that Plaintiffs purchased several new Samsung Smart TVs well after the lawsuit was filed but failed to provide the DUID, PSID, and other information about these Smart TVs. *See id.* at 2. And Plaintiffs have yet to supplement Plaintiff White’s interrogatories regarding his Smart TV in Kentucky despite having months to do so. Aug. 2, 2023 Joint Letter to the Court, at 6.

COVINGTON

August 28, 2023
Page 2

Plaintiffs' failure to fully respond to SEA's discovery requests directly implicates SEA's ability to search for and produce responsive documents. For example, DUID and PSID information from each of Plaintiffs' Samsung Smart TVs is critical to determining which terms or policies Plaintiffs may have agreed to and what information (if any) may have been collected from Plaintiffs' Smart TVs through ACR. Plaintiffs cannot shift the blame for delaying discovery to SEA when Plaintiffs have yet to produce documents and information responsive to SEA's requests and necessary for SEA to respond to Plaintiffs' requests.

II. Scope of Plaintiffs' Claim

During the August 21 meet and confer, Plaintiffs indicated—for the first time—that their sole remaining Wiretap Act claim is based on the theory that SEA intercepts communications sent from Samsung Smart TVs to Netflix or other content providers. Plaintiffs' August 23 letter goes even further, asserting that their claim encompasses “any means through which Samsung collects in real-time consumers' data and information through their SmartTV.” This is not what Plaintiffs pleaded in the Second Amended Complaint. Nor is it the claim that Judge Arleo previously allowed to proceed to discovery.

Plaintiffs' Wiretap Act claim is based entirely on ACR technology. Plaintiffs' key Wiretap allegation states that “Defendants, through their . . . involvement with *ACS software* have intentionally intercepted” Plaintiffs' communications. Plaintiffs' Second Amend. Compl. ¶ 167. Further references to ACR are replete throughout the Complaint. *See, e.g., id.* ¶ 44 (“Defendants' [ACR] tracking software captures information about a selection of pixels on the screen and sends that data to Defendants' servers . . .”); *see also* ¶¶ 38–47 (describing ACR). Crucially, nowhere in the Complaint do Plaintiffs identify any other technology that could possibly support their Wiretap Act claim. Nor do Plaintiffs allege that SEA otherwise intercepts communications sent *from* a Smart TV *to* third-party applications or allege that ACR is capable of doing so.

As discovery has made clear, ACR technology generates data based on the pixels that display on a Smart TV screen; it does not involve sending, let alone “intercepting,” communications sent from the Smart TV to a streaming app or other content provider. *See* Samsung's Responses to Plaintiffs' First Set of Interrogatories, at 9 (responding to Interrogatory No. 3). This is public knowledge. Alan Wolk, *Why ACR Data Is Poised to Become the Future of TV Measurement*, *Forbes* (Feb. 19, 2018) (“On a technological level, ACR data works because smart TVs (with permission) capture a few pixels from whatever the viewer is currently watching on the TV and share that data with the TV manufacturer's ACR tracking software.”).

Judge Arleo recognized this in her opinion permitting Plaintiffs' Wiretap Act claim to proceed: “Plaintiffs have therefore alleged that there are two separate ‘communications’: one *from the content provider to the Smart TV*, and another from the Smart TV to Defendants' servers. And while Defendants are parties to the latter communication, it is the former that Plaintiffs allege was unlawfully intercepted.” ECF No. 104, at 6 (emphasis added). Judge Arleo reiterated this understanding again in her ruling on SEA's motion for reconsideration. ECF No. 131, at 3 (“[T]he [Second Amended Complaint] more clearly indicates [than the First Amended Complaint] that there are two relevant communications at issue, namely that there is first a communication between a consumer and a *content provider who transmits content to the*

COVINGTON

August 28, 2023
Page 3

consumer's Smart TV . . . the Court is satisfied Plaintiffs have adequately stated a Wiretap Act claim because, accepting the allegations as true, the [Second Amended Complaint] alleges that Defendants are not a party to the first communication." (emphasis added)).

The theory Plaintiffs identified at the August 21, 2023 meet and confer and in their letter is inconsistent with Plaintiffs' Complaint and the Court's orders. It further contradicts Plaintiffs' own position that any alleged communication is intercepted while it is "in transit *to Defendants' Smart TVs*." Plaintiffs' Opp. to Motion to Dismiss, ECF No. 97, at 27 (emphasis added). As discussed above, Plaintiffs' claims is premised solely on ACR. Any attempt to expand the scope of discovery beyond ACR or to reframe Plaintiffs' claim as alleging communications sent *from* Samsung Smart TVs thus would be improper and unsupported by Plaintiffs' pleadings.

III. Plaintiffs' Depositions

As noted below, SEA is willing to offer deposition dates for Messrs. Abuali and Chung. Plaintiffs' characterization of SEA as improperly "hold[ing] discovery . . . hostage" therefore is misplaced. Plaintiffs' Aug. 23, 2023 Letter, at 4. After maligning SEA for asking that Plaintiffs be made available for depositions and inspections during the same time period as Abuali and Chung, Plaintiffs engage in exactly what they complain of by conditioning Plaintiffs' depositions on SEA's production of certain documents. The Federal Rules impose no such requirement and SEA will not agree to one. Moreover, by conditioning Plaintiffs' depositions on the production of certain documents, you *are* refusing to make Plaintiffs available, despite your assertions to the contrary.

As discussed above, we also note that Plaintiffs' have not yet provided information that is critical to identifying data and documents that Plaintiffs have demanded before they will agree to submit to depositions. Specifically, Plaintiffs recently revealed that they both purchased new Samsung Smart TVs *after* filing this lawsuit claiming that Samsung Smart TVs intercepted their communications without their consent. Yet Plaintiffs have failed to provide the DUID, PSID, and other information for these new Smart TVs. This information is crucial to identifying any consent to terms and policies on these Smart TVs and any data collected from these Smart TVs.

SEA will not agree to any limitation on the scope or duration of Plaintiffs' depositions beyond those required by the Federal Rules. Plaintiffs' conclusory assertions that the Plaintiffs' depositions should be "very targeted" and limited to "two hours each" are contrary to the Federal Rules and prejudicial to SEA. Indeed, there are several important issues that need to be explored at Plaintiffs' depositions, including both Plaintiffs' purchase of Samsung Smart TVs *after* filing this lawsuit claiming a Wiretap Act violation. If Plaintiffs wish to impose any limitations on the scope or duration of their depositions or continue to refuse to make themselves available for depositions until SEA produces additional documents, they are required to seek a protective order, which SEA will oppose.

IV. SEA and SEC

Regarding the role of SEC, Plaintiffs continue to misunderstand that it is not SEA's job to do Plaintiffs' due diligence for them. The Federal Rules of Civil Procedure require SEA to respond to Plaintiffs' discovery requests, not produce factual evidence to support assertions

COVINGTON

August 28, 2023
Page 4

made by counsel in a good faith effort to move discovery forward. *See generally* Fed. R. Civ. P. 26(b); Fed. R. Civ. P. 33(b); Fed. R. Civ. P. 34(b)(2). SEA has disclosed to both Plaintiffs and the Court that it is not responsible for ACR technology and that SEA's parent company, Samsung Electronics Co., Ltd. ("SEC"), is. ECF No. 234, at 5–6. As explained in SEA's August 14, 2023 letter, Plaintiffs have been on notice that SEC was involved in ACR and might have relevant information and documents since at least March 2018. SEA's Aug. 14, 2023 Letter, at 1; *see* ECF NO. 61 at 7, 10. Plaintiffs chose to dismiss SEC and clearly dislike the consequences of that decision, but it cannot be laid at the feet of SEA.

Plaintiffs have not identified any specific rule or obligation that would justify court intervention. None of Plaintiffs' requests for production ask SEA to produce "communications [that] disclosed SEC's involvement in the data flow at the heart of Plaintiffs' Wiretap Act claim." Plaintiffs' Aug. 23, 2023 Letter, at 2. Nor do they ask for "communications . . . [disclosing that SEC] possessed the bulk of the discovery in this case." *Id.* Plaintiffs' abstract complaint that their strategic decisions had the repercussion of making discovery more difficult for themselves does not present a ripe controversy for the Court to resolve.

Plaintiffs further cannot continue to try to litigate against SEC through SEA. As previously explained, SEA cannot and will not respond on behalf of an entity that it has no authority to speak for. *See* SEA's Aug. 14, 2023 Letter, at 3.

V. Discovery Requests

As an initial matter, SEA notes that Plaintiffs continue to move the goal posts with each letter that they send and each meet and confer they request. Each letter contains new demands that SEA produce ever-changing categories of documents or information, many of which are not tied to a specific discovery request, on an unreasonably short timeframe, often in a matter of days. *See, e.g.*, Plaintiffs' Aug. 8, 2023 Letter, at 2 (asking SEA to identify all responsive documents and information in its possession, custody, or control in three days); Plaintiffs' Aug. 23, 2023 Letter, at 4 (asking SEA to provide a list of all potential custodians, non-custodial sources, and all search terms or other methods by which SEA plans to find responsive materials in two days).

SEA has agreed to search for documents in response to many of Plaintiffs' requests. Many of those requests cover a more than eight-year period and hundreds of models of Smart TVs, and therefore require time to investigate. SEA will continue to search for and produce responsive documents pursuant to the timeline it proposed for document production—which Plaintiffs never objected to—and the Court's scheduling orders. ECF Nos. 223 (scheduling the close of fact discovery for March 31, 2024), 233.

A. List of Smart TV Models

As discussed during our meeting, SEA is willing to provide a list of Samsung Smart TV models that it believes may potentially be encompassed in the proposed class definition. The list is attached to this letter as Appendix A.

COVINGTON

August 28, 2023

Page 5

B. Custodial Document Searches

SEA is still considering Plaintiffs' request regarding custodial document searches. Based on SEA's preliminary investigation, it appears unlikely that Messrs. Abuali and Chung have custodial documents relating to the functionality of ACR, but they may have some custodial documents relating to the Smart TV setup process. SEA proposes meeting and conferring regarding the need for and scope of custodial searches after it has gathered additional information regarding Messrs. Abuali and Chung's custodial documents.

C. Abuali and Chung Depositions and Plaintiffs Depositions

SEA will consult with Messrs. Abuali and Chung and provide proposed dates for their depositions by August 31. But as discussed during the August 21 meet and confer, to the extent any custodial documents are produced after Abuali's and Chung's depositions, it is our understanding that Plaintiffs agree not use those documents as a basis to reopen their depositions.

D. Consent and Data Related Documents

Regarding your request for the categories stored in the consent database referenced in the Abuali and Chung declarations, we note that the portions of the database attached as exhibits to the Abuali and Chung declarations reflect certain categories of information in the database. We are attempting to determine whether these exhibits reflect the full list of categories in the database or if there are additional categories of information. We expect to provide an update to you regarding this request by September 8.

Regarding Plaintiffs' request for documents related to data collection, SEA has agreed to search for documents related to the functionality of ACR technology and documents reflecting any data collected from Plaintiffs' Smart TVs through ACR. SEA's June 8, 2023 Responses to Plaintiffs' First Set of Requests for Production, at 24–25, 28, 32 (responding to RFP Nos. 17, 20, and 24). Because SEA does not operate ACR technology, it does not appear that SEA has many, if any, documents regarding how ACR functions or regarding how and where data collected through ACR is transmitted. Regarding data collected through ACR, SEA has agreed to search for data collected from Plaintiffs' Smart TVs through ACR. *Id.* at 28, 32 (responding to RFP Nos. 20, 24). It appears that at least some data collected from Samsung Smart TVs through ACR is held in the U.S. and we are searching for it. We expect to provide an update to you regarding these issues by September 8.

E. Terms and Conditions and Privacy Policies

As explained above and in its responses and objections, SEA has agreed to search for and produce terms and conditions, privacy policies, and notices related to ACR only because the only remaining claim pled in the Complaint is premised on ACR. To be clear, SEA is willing to produce all final versions of the terms and conditions, privacy policies, and notices related to ACR that it is able to locate from a reasonable search of documents in its possession, custody, or control; it will not withhold such materials.

COVINGTON

August 28, 2023
Page 6

SEA's search for these terms and conditions, privacy policies, and notices is ongoing. However, SEA does not maintain or possess a centralized repository of Smart TV terms and conditions, privacy policies, and notices, and therefore may not have possession, custody, or control over all sets of terms applicable to the entire proposed class.¹ We expect to be able to either produce additional relevant terms and conditions, privacy policies, and notices, or confirm that SEA does not have any such additional materials in its possession, custody, or control, by September 8.

Sincerely,

/s/ Emily Johnson Henn

Emily Johnson Henn

cc: Counsel of record

¹ Footnote 1 of your letter mischaracterizes SEA's position. As explained during the meet and confer, terms and conditions presented during the Samsung account creation process are not relevant to ACR. Because Plaintiffs' remaining claim is based *on ACR*, they are also not relevant to Plaintiffs' claim. To the extent Plaintiffs seek to broaden their claim beyond the Complaint to include any data collected through means other than ACR (which SEA opposes), SEA reserves its right to rely on additional terms and policies that may be relevant to any such data collection.

Appendix A

Smart TV Model Numbers
MNA110MS1ACXZA
QN32LS03BBFXZA
QN32LS03BDFXZA
QN32LS03CBFXZA
QN32LS03TBFXZA
QN32LS03TDFXZA
QN32Q50RAFXZA
QN32Q60AAFXZA
QN32Q60CAFXZA
QN43LS01BAFXZA
QN43LS01TAFXZA
QN43LS03AAFXZA
QN43LS03ADFXZA
QN43LS03BAFXZA
QN43LS03BDFXZA
QN43LS03RAFXZA
QN43LS03TAFXZA
QN43LS05BAFXZA
QN43LS05TAFXZA
QN43Q60AAFXZA
QN43Q60BAFXZA
QN43Q60BDFXZA
QN43Q60CAFXZA
QN43Q60RAFXZA
QN43Q60TAFXZA
QN43Q60TBFXZA
QN43Q6DAAFXZA
QN43Q6DRAFXZA
QN43Q6DTAFXZA
QN43QN90AAFXZA
QN43QN90BAFXZA
QN43QN90BDFXZA
QN43QN90CAFXZA
QN49LS03RAFXZA
QN49Q60RAFXZA
QN49Q65FNFXZA
QN49Q6DRAFXZA
QN49Q6FAMFXZA
QN49Q6FNAFXZA
QN49Q6FNAVXZA
QN49Q70RAFXZA
QN49Q7DRAFXZA
QN49Q80TAFXZA
QN49Q8DTAFXZA

QN50LS03AAFXZA
QN50LS03ADFXZA
QN50LS03BAFXZA
QN50LS03BDFXZA
QN50LS03TAFXZA
QN50Q60AAFXZA
QN50Q60BAFXZA
QN50Q60BDFXZA
QN50Q60CAFXZA
QN50Q60TAFXZA
QN50Q60TBFXZA
QN50Q6DAAFXZA
QN50Q6DTAFXZA
QN50Q80AAFXZA
QN50Q80BAFXZA
QN50Q80BDFXZA
QN50Q80CAFXZA
QN50Q80TAFXZA
QN50Q8DAAFXZA
QN50Q8DTAFXZA
QN50QN90AAFXZA
QN50QN90BAFXZA
QN50QN90BDFXZA
QN50QN90CAFXZA
QN50QN9DAAFXZA
QN55LS01BAFXZA
QN55LS01RAFXZA
QN55LS01TAFXZA
QN55LS03AAFXZA
QN55LS03ADFXZA
QN55LS03BAFXZA
QN55LS03BDFXZA
QN55LS03RAFXZA
QN55LS03TAFXZA
QN55LST7TAFXZA
QN55Q60AAFXZA
QN55Q60BAFXZA
QN55Q60BDFXZA
QN55Q60CAFXZA
QN55Q60CBFXZA
QN55Q60CDFXZA
QN55Q60RAFXZA
QN55Q60TAFXZA
QN55Q60TBFXZA
QN55Q65FMFXZA
QN55Q65FNFXZA
QN55Q6DAAFXZA

QN55Q6DRAFXZA
QN55Q6DTAFXZA
QN55Q6FAMFXZA
QN55Q6FNAFXZA
QN55Q6FNAVXZA
QN55Q70AAFXZA
QN55Q70CAFXZA
QN55Q70CDFXZA
QN55Q70RAFXZA
QN55Q70TAFXZA
QN55Q75CNFXZA
QN55Q75FMFXZA
QN55Q75FNFXZA
QN55Q7CAMFXZA
QN55Q7CDMFXZA
QN55Q7CNAFXZA
QN55Q7DAAFXZA
QN55Q7DRAFXZA
QN55Q7DTAFXZA
QN55Q7FAMFXZA
QN55Q7FDMFXZA
QN55Q7FNAFXZA
QN55Q7FVMFXZA
QN55Q80AAFXZA
QN55Q80BAFXZA
QN55Q80BDFXZA
QN55Q80CAFXZA
QN55Q80CDFXZA
QN55Q80RAFXZA
QN55Q80TAFXZA
QN55Q8CAMFXZA
QN55Q8DAAFXZA
QN55Q8DTAFXZA
QN55Q8FNBFXZA
QN55Q8FNBVXZA
QN55Q900RBFXZA
QN55Q90TAFXZA
QN55Q90TDFXZA
QN55QN700BFXZA
QN55QN85AAFXZA
QN55QN85BAFXZA
QN55QN85BDFXZA
QN55QN85CAFXZA
QN55QN85CDFXZA
QN55QN85DAFXZA
QN55QN90AAFXZA
QN55QN90BAFXZA

QN55QN90BDFXZA
QN55QN90CAFXZA
QN55QN95BAFXZA
QN55QN95BDFXZA
QN55QN9DAAFXZA
QN55S90CAFXZA
QN55S90CDFXZA
QN55S95BAFXZA
QN55S95BDFXZA
QN55S95CAFXZA
QN58Q60TAFXZA
QN58Q6DTAFXZA
QN60Q60AAFXZA
QN60Q60BAFXZA
QN60Q60BDFXZA
QN60Q6DAAFXZA
QN65LS01BAFXZA
QN65LS01TAFXZA
QN65LS03AAFXZA
QN65LS03ADFXZA
QN65LS03BAFXZA
QN65LS03BDFXZA
QN65LS03RAFXZA
QN65LS03TAFXZA
QN65LST7TAFXZA
QN65LST9TAFXZA
QN65Q60AAFXZA
QN65Q60BAFXZA
QN65Q60BDFXZA
QN65Q60CAFXZA
QN65Q60CBFXZA
QN65Q60CDFXZA
QN65Q60RAFXZA
QN65Q60TAFXZA
QN65Q60TBFXZA
QN65Q65FNFXZA
QN65Q6DAAFXZA
QN65Q6DRAFXZA
QN65Q6DTAFXZA
QN65Q6FNAFXZA
QN65Q6FNAVXZA
QN65Q70AAFXZA
QN65Q70CAFXZA
QN65Q70CDFXZA
QN65Q70RAFXZA
QN65Q70TAFXZA
QN65Q75CNFXZA

QN65Q75FNFXZA
QN65Q7CAMFXZA
QN65Q7CDMFXZA
QN65Q7CNAFXZA
QN65Q7CNAVXZA
QN65Q7DAAFXZA
QN65Q7DRAFXZA
QN65Q7DTAFXZA
QN65Q7FAMFXZA
QN65Q7FDMFXZA
QN65Q7FNAFXZA
QN65Q800TAFXZA
QN65Q80AAFXZA
QN65Q80BAFXZA
QN65Q80BDFXZA
QN65Q80CAFXZA
QN65Q80CDFXZA
QN65Q80RAFXZA
QN65Q80TAFXZA
QN65Q850TAFXZA
QN65Q8CAMFXZA
QN65Q8DAAFXZA
QN65Q8DTAFXZA
QN65Q8FNBFXZA
QN65Q900RBFXZA
QN65Q900TSFXZA
QN65Q90RAFXZA
QN65Q90TAFXZA
QN65Q90TDFXZA
QN65Q9FAMFXZA
QN65Q9FNAFXZA
QN65QN800AFXZA
QN65QN800BFXZA
QN65QN800CFXZA
QN65QN850AFXZA
QN65QN850BFXZA
QN65QN850CFXZA
QN65QN85AAFXZA
QN65QN85BAFXZA
QN65QN85BDFXZA
QN65QN85CAFXZA
QN65QN85CDFXZA
QN65QN85DAFXZA
QN65QN900AFXZA
QN65QN900BFXZA
QN65QN900CFXZA
QN65QN90AAFXZA

QN65QN90BAFXZA
QN65QN90BDFXZA
QN65QN90CAFXZA
QN65QN90CDFXZA
QN65QN95BAFXZA
QN65QN95BDFXZA
QN65QN95CAFXZA
QN65QN9DAAFXZA
QN65S90CAFXZA
QN65S90CDFXZA
QN65S95BAFXZA
QN65S95BDFXZA
QN65S95CAFXZA
QN70Q60AAFXZA
QN70Q60AAVXZA
QN70Q60BAFXZA
QN70Q60BDFXZA
QN70Q60CAFXZA
QN70Q6DAAFXZA
QN70Q6DAAVXZA
QN70Q6DTAFXZA
QN75LS03AAFXZA
QN75LS03ADFXZA
QN75LS03BAFXZA
QN75LS03BDFXZA
QN75LS03TAFXZA
QN75LST7TAFXZA
QN75LST9TAFXZA
QN75Q60AAFXZA
QN75Q60BAFXZA
QN75Q60BDFXZA
QN75Q60CAFXZA
QN75Q60CBFXZA
QN75Q60CDFXZA
QN75Q60RAFXZA
QN75Q60TAFXZA
QN75Q60TBFXZA
QN75Q65FNFXZA
QN75Q6DAAFXZA
QN75Q6DRAFXZA
QN75Q6DTAFXZA
QN75Q6FNAFXZA
QN75Q70AAFXZA
QN75Q70CAFXZA
QN75Q70CDFXZA
QN75Q70RAFXZA
QN75Q70TAFXZA

QN75Q75FMFXZA
QN75Q75FNFXZA
QN75Q7DAAFEXZA
QN75Q7DRAFEXZA
QN75Q7DTAFEXZA
QN75Q7FAMFXZA
QN75Q7FNAFXZA
QN75Q800TAFXZA
QN75Q80AAFEXZA
QN75Q80BAFXZA
QN75Q80BDFEXZA
QN75Q80CAFXZA
QN75Q80CDFEXZA
QN75Q80RAFXZA
QN75Q80TAFXZA
QN75Q850TAFXZA
QN75Q8BAAFXZA
QN75Q8CAMFXZA
QN75Q8DAAFEXZA
QN75Q8DTAFEXZA
QN75Q8FNBFXZA
QN75Q900RBFEXZA
QN75Q900TSFXZA
QN75Q90RAFXZA
QN75Q90TAFXZA
QN75Q90TDFEXZA
QN75Q9FAMFXZA
QN75Q9FNAFXZA
QN75QN800AFXZA
QN75QN800BFXZA
QN75QN800CFEXZA
QN75QN84AAFEXZA
QN75QN850AFXZA
QN75QN850BFXZA
QN75QN85AAFEXZA
QN75QN85BAFXZA
QN75QN85BDFEXZA
QN75QN85CAFXZA
QN75QN85CDFEXZA
QN75QN85DAFXZA
QN75QN900AFXZA
QN75QN900BFXZA
QN75QN900CFEXZA
QN75QN90AAFEXZA
QN75QN90BAFXZA
QN75QN90BDFEXZA
QN75QN90CAFXZA

QN75QN90CDFXZA
QN75QN95BAFXZA
QN75QN95BDFXZA
QN75QN95CAFXZA
QN75QN9DAAFXZA
QN77S90CAFXZA
QN77S95CAFXZA
QN82Q60RAFXZA
QN82Q60TAFXZA
QN82Q65FNBXZA
QN82Q65FNFXZA
QN82Q6DRAFXZA
QN82Q6DTAFXZA
QN82Q6FNAFXZA
QN82Q70RAFXZA
QN82Q70TAFXZA
QN82Q7DRAFXZA
QN82Q800TAFXZA
QN82Q80RAFXZA
QN82Q850TAFXZA
QN82Q8FNBFXZA
QN82Q900RBFXZA
QN82Q90RAFXZA
QN85LS03AAFXZA
QN85LS03ADFXZA
QN85LS03BAFXZA
QN85LS03BDFXZA
QN85Q60AAFXZA
QN85Q60BAFXZA
QN85Q60BDFXZA
QN85Q60CAFXZA
QN85Q60CDFXZA
QN85Q60TAFXZA
QN85Q6DAAFXZA
QN85Q6DTAFXZA
QN85Q70AAFXZA
QN85Q70CAFXZA
QN85Q70CDFXZA
QN85Q70RAFXZA
QN85Q70TAFXZA
QN85Q7DAAFXZA
QN85Q7DRAFXZA
QN85Q7DTAFXZA
QN85Q80AAFXZA
QN85Q80BAFXZA
QN85Q80BDFXZA
QN85Q80CAFXZA

QN85Q80TAFXZA
QN85Q8DAAFXZA
QN85Q8DTAFXZA
QN85Q900RAFXZA
QN85Q900TSFXZA
QN85Q90TAFXZA
QN85Q950TSFXZA
QN85QN800AFXZA
QN85QN800BFXZA
QN85QN800CFXZA
QN85QN850AFXZA
QN85QN850BFXZA
QN85QN850CFXZA
QN85QN85AAFXZA
QN85QN85BAFXZA
QN85QN85BDFXZA
QN85QN85CAFXZA
QN85QN85CDFXZA
QN85QN85DAFXZA
QN85QN900AFXZA
QN85QN900BFXZA
QN85QN900CFXZA
QN85QN90AAFXZA
QN85QN90BAFXZA
QN85QN90BDFXZA
QN85QN90CAFXZA
QN85QN90CDFXZA
QN85QN95BAFXZA
QN85QN95BDFXZA
QN85QN95CAFXZA
QN85QN9DAAFXZA
QN88Q9FAMFXZA
QN98Q900RBFXZA
QN98QN100BFXZA
QN98QN90AAFXZA
SP-LSP3BLAXZA
SP-LSP7TFAXZA
SP-LSP9TFAXZA
UN105S9WAFXZA
UN24H4500AFXZA
UN24M4500AFXZA
UN28H4500AFXZA
UN28M4500AFXZA
UN32H5201AFXZA
UN32H5203AFXZA
UN32H5500AFXZA
UN32H6350AFXZA

UN32J4500AFXZA
UN32J5205AFXZA
UN32J525DAFXZA
UN32J5500AFXZA
UN32J6300AFXZA
UN32M4500AFXZA
UN32M4500BFXZA
UN32M5300AFXZA
UN32M530DAFXZA
UN32N5300AFXZA
UN40H5201AFXZA
UN40H5203AFXZA
UN40H6203AFXZA
UN40J5200AFXZA
UN40J520DAFXZA
UN40J5500AFXZA
UN40J6200AFXZA
UN40J6300AFXZA
UN40JU6400FXZA
UN40JU640DFXZA
UN40JU6500BXZA
UN40JU6500FXZA
UN40JU650DFXZA
UN40JU6700FXZA
UN40JU7100FXZA
UN40JU7500FXZA
UN40K6250AFXZA
UN40KU6290FXZA
UN40KU6300FXZA
UN40KU7000FXZA
UN40LS001AFXZA
UN40LS001CFXZA
UN40M5300AFXZA
UN40M530DAFXZA
UN40MU6290FXZA
UN40MU6300FXZA
UN40MU630DFXZA
UN40MU7000FXZA
UN40N5200AFXZA
UN40NU6070FXZA
UN40NU7100FXZA
UN40NU7200FXZA
UN43AU8000BXZA
UN43AU8000FXZA
UN43CU7000BXZA
UN43CU7000DXZA
UN43CU7000FXZA

UN43CU8000BXZA
UN43CU8000FXZA
UN43J5200AFXZA
UN43J5202AFXZA
UN43JU640DFXZA
UN43KU6300FXZA
UN43KU630DFXZA
UN43KU7000FXZA
UN43KU7500FXZA
UN43LS003AFXZA
UN43LS03NAFXZA
UN43M5300AFXZA
UN43M530DAFXZA
UN43MU6290FXZA
UN43MU6300FXZA
UN43MU630DFXZA
UN43N5300AFXZA
UN43NU6900BXZA
UN43NU6900FXZA
UN43NU6950BXZA
UN43NU6950FXZA
UN43NU7100FXZA
UN43NU710DFXZA
UN43RU7100FXZA
UN43RU7200FXZA
UN43TU690TFXZA
UN43TU7000BXZA
UN43TU7000FXZA
UN43TU700DFXZA
UN43TU8000FXZA
UN43TU8200FXZA
UN46H5203AFXZA
UN46H6201AFXZA
UN46H6203AFXZA
UN46H7150AFXZA
UN48H8000AFXZA
UN48J5200AFXZA
UN48J5201AFXZA
UN48J520DAFXZA
UN48J5500AFXZA
UN48J6200AFXZA
UN48J6300AFXZA
UN48JS8500FXZA
UN48JS9000FXZA
UN48JU6400FXZA
UN48JU640DFXZA
UN48JU6500FXZA

UN48JU6700FXZA
UN48JU7500FXZA
UN49J5000AFXZA
UN49K6250AFXZA
UN49KS8000FXZA
UN49KS8500FXZA
UN49KU6500FXZA
UN49KU650DFXZA
UN49KU7000FXZA
UN49KU7500FXZA
UN49M5300AFXZA
UN49M530DAFXZA
UN49MU6290FXZA
UN49MU6500FXZA
UN49MU650DFXZA
UN49MU7000FXZA
UN49MU7500FXZA
UN49MU7600FXZA
UN49MU8000FXZA
UN49MU800DFXZA
UN49NU6300FXZA
UN49NU8000FXZA
UN49RU8000FXZA
UN50AU8000BXZA
UN50AU8000FXZA
UN50CU7000BXZA
UN50CU7000DXZA
UN50CU7000FXZA
UN50CU8000BXZA
UN50CU8000FXZA
UN50H5203AFXZA
UN50H5500AFXZA
UN50H6201AFXZA
UN50H6203AFXZA
UN50H6350AFXZA
UN50H6400AFXZA
UN50HU8550FXZA
UN50J5200AFXZA
UN50J5201AFXZA
UN50J520DAFXZA
UN50J5500AFXZA
UN50J6200AFXZA
UN50J6300AFXZA
UN50JS7000FXZA
UN50JU6401FXZA
UN50JU6500FXZA
UN50JU650DFXZA

UN50JU7100FXZA
UN50JU7500FXZA
UN50KU6290FXZA
UN50KU6300FXZA
UN50KU630DFXZA
UN50M5300AFXZA
UN50M530DAFXZA
UN50MU6070FXZA
UN50MU6300FXZA
UN50MU630DFXZA
UN50NU6900BXZA
UN50NU6900FXZA
UN50NU6950FXZA
UN50NU7100FXZA
UN50NU7100VXZA
UN50NU710DFXZA
UN50NU7200FXZA
UN50RU7100FXZA
UN50RU710DFXZA
UN50RU7200FXZA
UN50TU690TFXZA
UN50TU7000BXZA
UN50TU7000FXZA
UN50TU700DFXZA
UN50TU8000FXZA
UN50TU8200FXZA
UN55AU8000BXZA
UN55AU8000FXZA
UN55AU800DFXZA
UN55CU7000BXZA
UN55CU7000DXZA
UN55CU7000FXZA
UN55CU8000BXZA
UN55CU8000DXZA
UN55CU8000FXZA
UN55H6203AFXZA
UN55H6300AFXZA
UN55H6350AFXZA
UN55H6400AFXZA
UN55H7150AFXZA
UN55H8000AFXZA
UN55HU6830FXZA
UN55HU6840FXZA
UN55HU7200FXZA
UN55HU8500FXZA
UN55HU8550FXZA
UN55HU9000FXZA

UN55J6200AFXZA
UN55J6201AFXZA
UN55J620DAFXZA
UN55J6300AFXZA
UN55JS7000FXZA
UN55JS700DFXZA
UN55JS8500FXZA
UN55JS850DFXZA
UN55JS9000FXZA
UN55JU6400FXZA
UN55JU640DFXZA
UN55JU6500FXZA
UN55JU650DFXZA
UN55JU6700FXZA
UN55JU670DFXZA
UN55JU7100FXZA
UN55JU7500FXZA
UN55K6250AFXZA
UN55K625DAFXZA
UN55KS8000FXZA
UN55KS800DFXZA
UN55KS8500FXZA
UN55KS850DFXZA
UN55KS9000FXZA
UN55KS9500FXZA
UN55KU6270FXZA
UN55KU6290FXZA
UN55KU6300FXZA
UN55KU630DFXZA
UN55KU6500FXZA
UN55KU650DFXZA
UN55KU6600FXZA
UN55KU7000FXZA
UN55KU700DFXZA
UN55KU7500FXZA
UN55KU750DFXZA
UN55LS003AFXZA
UN55LS03NAFXZA
UN55MU6071FXZA
UN55MU6290FXZA
UN55MU6300FXZA
UN55MU630DFXZA
UN55MU6490FXZA
UN55MU6500FXZA
UN55MU650DFXZA
UN55MU7000FXZA
UN55MU700DFXZA

UN55MU7100FXZA
UN55MU7500FXZA
UN55MU7600FXZA
UN55MU8000FXZA
UN55MU800DFXZA
UN55MU8500FXZA
UN55MU850DFXZA
UN55MU9000FXZA
UN55NU6080FXZA
UN55NU6900BXZA
UN55NU6900FXZA
UN55NU6950FXZA
UN55NU7100FXZA
UN55NU710DFXZA
UN55NU7200FXZA
UN55NU7300FXZA
UN55NU740DFXZA
UN55NU8000FXZA
UN55NU800DFXZA
UN55NU8500FXZA
UN55RU7100FXZA
UN55RU7200FXZA
UN55RU7300FXZA
UN55RU730DFXZA
UN55RU740DFXZA
UN55RU8000FXZA
UN55RU800DFXZA
UN55TU7000BXZA
UN55TU7000FXZA
UN55TU700DFXZA
UN55TU8000FXZA
UN55TU8200FXZA
UN55TU8300FXZA
UN55TU850DFXZA
UN58CU7000DXZA
UN58CU7000FXZA
UN58H5202AFXZA
UN58J5190AFXZA
UN58J5190BFXZA
UN58MU6070EXZA
UN58MU6070FXZA
UN58MU6071FXZA
UN58MU6100FXZA
UN58NU6080FXZA
UN58NU7100FXZA
UN58NU710DFXZA
UN58RU7100FXZA

UN58RU710DFXZA
UN58TU690TFXZA
UN58TU7000FXZA
UN58TU700DFXZA
UN60H6203AFXZA
UN60H6300AFXZA
UN60H6350AFXZA
UN60H6400AFXZA
UN60H7100AFXZA
UN60H7150AFXZA
UN60HU8500FXZA
UN60HU8550FXZA
UN60J6200AFXZA
UN60J620DAFXZA
UN60J6300AFXZA
UN60JS7000FXZA
UN60JS700DFXZA
UN60JS8000FXZA
UN60JU6390FXZA
UN60JU6400FXZA
UN60JU6500FXZA
UN60JU650DFXZA
UN60JU7090FXZA
UN60JU7100FXZA
UN60KS8000FXZA
UN60KS800DFXZA
UN60KU6270FXZA
UN60KU6300FXZA
UN60KU630DFXZA
UN60TU690TFXZA
UN60TU7000FXZA
UN60TU700DFXZA
UN65AU8000BXZA
UN65AU8000FXZA
UN65AU800DFXZA
UN65CU7000BXZA
UN65CU7000DXZA
UN65CU7000FXZA
UN65CU8000BXZA
UN65CU8000DXZA
UN65CU8000FXZA
UN65H6203AFXZA
UN65H6300AFXZA
UN65H6350AFXZA
UN65H6400AFXZA
UN65H7100AFXZA
UN65H7150AFXZA

UN65H8000AFXZA
UN65HU8500FXZA
UN65HU8550FXZA
UN65HU9000FXZA
UN65J6200AFXZA
UN65J620DAFXZA
UN65J6300AFXZA
UN65J630DAFXZA
UN65JS8500FXZA
UN65JS850DFXZA
UN65JS9000FXZA
UN65JS9500FXZA
UN65JU639DFXZA
UN65JU6400FXZA
UN65JU640DFXZA
UN65JU6500FXZA
UN65JU650DFXZA
UN65JU6700FXZA
UN65JU670DFXZA
UN65JU7100FXZA
UN65JU7500FXZA
UN65JU750DFXZA
UN65KS8000FXZA
UN65KS800DFXZA
UN65KS8500FXZA
UN65KS850DFXZA
UN65KS9000FXZA
UN65KS900DFXZA
UN65KS9500FXZA
UN65KS950DFXZA
UN65KS9800FXZA
UN65KU6290FXZA
UN65KU6300FXZA
UN65KU630DFXZA
UN65KU649DFXZA
UN65KU6500FXZA
UN65KU650DFXZA
UN65KU7000FXZA
UN65KU700DFXZA
UN65KU7500FXZA
UN65KU750DFXZA
UN65LS003AFXZA
UN65LS03NAFXZA
UN65MU6070FXZA
UN65MU6290FXZA
UN65MU6290VXZA
UN65MU6300FXZA

UN65MU630DFXZA
UN65MU6500FXZA
UN65MU650DFXZA
UN65MU7000FXZA
UN65MU700DFXZA
UN65MU7100FXZA
UN65MU7500FXZA
UN65MU7600FXZA
UN65MU8000FXZA
UN65MU800DFXZA
UN65MU8500FXZA
UN65MU850DFXZA
UN65MU9000FXZA
UN65NU6070FXZA
UN65NU6080FXZA
UN65NU6900FXZA
UN65NU6950FXZA
UN65NU7100FXZA
UN65NU710DFXZA
UN65NU7200FXZA
UN65NU7300FXZA
UN65NU730DFXZA
UN65NU740DFXZA
UN65NU8000FXZA
UN65NU800DFXZA
UN65NU8500FXZA
UN65RU7100FXZA
UN65RU710DFXZA
UN65RU7200FXZA
UN65RU7300FXZA
UN65RU730DFXZA
UN65RU740DFXZA
UN65RU8000FXZA
UN65RU800DFXZA
UN65RU9000FXZA
UN65TU690TFXZA
UN65TU7000BXZA
UN65TU7000FXZA
UN65TU700DFXZA
UN65TU8000FXZA
UN65TU8200FXZA
UN65TU8300FXZA
UN65TU850DFXZA
UN70CU7000BXZA
UN70CU7000DXZA
UN70CU7000FXZA
UN70KU6300FXZA

UN70KU630DFXZA
UN70NU6070FXZA
UN70NU6900FXZA
UN70TU6980FXZA
UN70TU6985FXZA
UN70TU7000BXZA
UN70TU7000FXZA
UN70TU7000WXZA
UN70TU700DBXZA
UN70TU700DFXZA
UN75AU8000BXZA
UN75AU8000FXZA
UN75AU800DFXZA
UN75CU7000BXZA
UN75CU7000DXZA
UN75CU7000FXZA
UN75CU8000BXZA
UN75CU8000DXZA
UN75CU8000FXZA
UN75H6300AFXZA
UN75H7150AFXZA
UN75HU8550FXZA
UN75J6300AFXZA
UN75J630DAFXZA
UN75JU641DFXZA
UN75JU6500FXZA
UN75JU650DFXZA
UN75JU7100FXZA
UN75KS9000FXZA
UN75KS900DFXZA
UN75MU6070FXZA
UN75MU6290FXZA
UN75MU6300FXZA
UN75MU630DFXZA
UN75MU8000FXZA
UN75MU800DFXZA
UN75MU9000FXZA
UN75NU6080FXZA
UN75NU6900FXZA
UN75NU6950FXZA
UN75NU7100FXZA
UN75NU710DEXZA
UN75NU710DFXZA
UN75NU7200FXZA
UN75NU8000FXZA
UN75NU800DFXZA
UN75RU7100FXZA

UN75RU710DFXZA
UN75RU7200FXZA
UN75RU8000FXZA
UN75RU800DFXZA
UN75RU9000FXZA
UN75TU690TFXZA
UN75TU7000BXZA
UN75TU7000FXZA
UN75TU700DFXZA
UN75TU8000FXZA
UN75TU8200FXZA
UN78HU9000FXZA
UN78JS8600FXZA
UN78JS9100FXZA
UN78JS9500FXZA
UN78JU7500FXZA
UN78JU750DFXZA
UN78KS9500FXZA
UN78KS9800FXZA
UN78KU7500FXZA
UN78KU750DFXZA
UN82MU8000FXZA
UN82MU800DFXZA
UN82NU8000FXZA
UN82NU800DFXZA
UN82RU8000FXZA
UN82RU800DFXZA
UN82RU9000FXZA
UN82TU6950FXZA
UN82TU7000FXZA
UN82TU700DFXZA
UN85AU7980FXZA
UN85AU8000FXZA
UN85AU800DFXZA
UN85CU7000BXZA
UN85CU7000DXZA
UN85CU7000FXZA
UN85CU8000DXZA
UN85CU8000FXZA
UN85HU8550FXZA
UN85JU645DFXZA
UN85JU7100FXZA
UN85TU690TFXZA
UN85TU7000FXZA
UN85TU700DFXZA
UN85TU8000FXZA
UN85TU800DFXZA

UN86TU9000FXZA
UN86TU9010FXZA
UN88JS9500FXZA
UN88KS9810FXZA